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FEB 16 2001

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February 13, 2001

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: In the Matter of Automatic Roaming Obligations Pertaining to
Commercial Mobile Radio Services (WT Docket No. 00-193)**

Dear Ms. Salas:

The **Dothan - Houston County Communications District** oversees the implementation and operation of E-911 service in **Dothan - Houston County**. We wanted to take this opportunity to state our view on the above-referenced proceeding, which is pending before the Federal Communications Commission. As you know, E-911 service is necessary to enable persons to make emergency calls on their mobile phones. We support the adoption of an automatic roaming rule because such a rule appears necessary to enable many mobile phone users in our community to utilize our E-911 services.

Over the past several years, we have spent considerable time and effort implementing the E-911 system for **Dothan - Houston County Communications District** and ensuring that we will be able to provide service in accordance with the FCC's goals. However, it has been brought to our attention that iDEN (a digital technology used by SMR carriers) subscribers cannot make even basic 911 calls to our E-911 system if they are outside of their home carrier's coverage area, even though another iDEN carrier may offer coverage in the area in question. This problem is due to a lack of roaming agreements between iDEN carriers, which prevents subscribers from using their phones in our jurisdiction if they are outside their home carrier's service area. Because of the lack of technological compatibility between iDEN phones and any other wireless technology, including analog cellular, iDEN subscribers who today find themselves outside of their home carrier's coverage area are truly left with no means by which to call 911 if they were to need emergency assistance.

Our understanding is that iDEN subscribers' inability to call 911 in all instances would be solved if iDEN carriers entered into automatic roaming agreements. Due to the nature of the technology used by such carriers, they can only enter roaming agreements

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Ms. Magalie R. Salas
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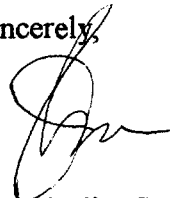
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with carriers using similar technology (not cellular or PCS carriers). For whatever reason, however, they are not doing so. Although the **Dothan Houston County Communications District** is not an advocate for any individual carrier -- we view and treat all carriers equally -- our overriding concern is to facilitate E-911 service to all persons using mobile phones in **[name of county or locality]**. Therefore, to ensure that all iDEN subscribers have the ability to enhance their safety through the utilization of our system, we believe that adoption of an automatic roaming rule is in the public interest.

Thank you for considering our position on this matter.

Sincerely,



Captain Jim Smith
9-1-1 Coordinator

cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
Paul Murray, Wireless Telecommunications Bureau

bcc: Michael D. Rosenthal, Southern LINC

Smith, Jim

From: Hall, Pat
Sent: Tuesday, February 13, 2001 2:08 PM
To: 'JLSMITH@DOTHAN.ORG'
Subject: FW: Letter on E911 and Roaming

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Capt. Smith,
Please have a Phrase I request letter forwarded to Jean, she has never received one. Her address is below...Thanks
Pat

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-----Original Message-----

From: Martin, Jean H. [SMTP:JHMARTIN@southernco.com] <mailto:[SMTP:JHMARTIN@southernco.com]>
Sent: Tuesday, February 13, 2001 1:14 PM
To: 'pahall@dothan.org'
Subject: Letter on E911 and Roaming

Hi Pat

Great talking with you this afternoon . . . my contact information is noted below.

Attached is a draft of the letter we'd discussed that you may want to use to support an automatic roaming rule before the FCC. Should you decide to support this effort, please complete the document and forward to our Washington contact at the following address:

Christine Gill
McDermott, Will & Emery
600 13th Street, NW
Washington, DC 20005-3096

Again, thank you for your help. If you have any questions or if I can assist further, please don't hesitate to call me.

<<Roaming Letter.DOC>>

Thanks

Jean

Jean H. Martin
Senior Engineering Analyst - Telephony & 911
Southern LINC®
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